

A. YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

1. All documents evidencing profits or losses sustained by Rings of Romance, including profits made or losses sustained as a result of operation of Van Scoy Diamond Mine of Delaware
2. All documents evidencing the grant of the right and the nature thereof, i.e. exclusive or non-exclusive, to use the mark "Van Scoy Diamond Mine".
3. All advertising materials used in or within 50 miles of the State of Delaware.
4. All documents evidencing establishment or proposed establishment of a store, franchise or licensee in the State of Delaware.

B. YOU ARE COMMANDED to designate one or more officers, directors or managing agents or other persons who consent to testify on behalf of Rings of Romance, Inc. t/a Van Scoy Diamond Mine, on the following matters:

1. Use of the mark "Van Scoy Diamond Mine"
2. All advertising materials used by Rings of Romance, Inc. t/a Van Scoy Diamond Mine.
3. All facts surrounding the establishment or proposed establishment of a store, franchise or licensee in the State of Delaware.
4. All profits made or losses sustained as a result of operation of Van Scoy Diamond Mines of Delaware.